

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

Bruce Cohn,

*Plaintiff,*

v.

Anna Popescu, TrustHFTwallet.com,  
and John Does 1 – 20,

*Defendants.*

Case No. 1:24-cv-00337

**Plaintiff's Motion for Entry  
of Amended Preliminary  
Injunction**

Plaintiff Bruce Cohn hereby requests that the Court enter an Amended Preliminary Injunction modifying the extant injunction entered by the Court on September 13, 2024 (Dkt. 15). In support, he respectfully shows the Court the following.

**I. Facts**

The owners of several cryptocurrency exchange accounts that were frozen under the extant injunction have cooperated with counsel and produced evidence indicating that they are not in league with the Defendants in this matter. The frozen accounts and the exchanges at which they are held are indicated below.

<i>Exchange</i>	<i>Deposit Address</i>
Binance	0x7d732b8fff5e1fcbf7c384c8ed1577209d7ed48f
Binance	0x16bae474cbdfca7214196decf6e74e856dd09e10
OKX	0x59dca074075b8d622d50bf8bdb78d2d168764fb0

The owners of each of the accounts listed above support the relief sought in this Motion. For that reason, this Motion does not raise any factual dispute between Mr. Cohn and the account owners who would be affected by entry of an amended injunction.

## **II. Applicable Law**

A district court has the discretion to modify its injunctive decrees “where changed circumstances require modification so as to effectuate the purposes underlying the initial grant of relief.”<sup>1</sup> A preliminary injunction is, after all, “an ambulatory remedy that marches along according to the nature of the proceeding ... subject to adaption as

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<sup>1</sup> *Pro Edge L.P. v. Gue*, 411 F. Supp. 2d 1080, 1086–87 (N.D. Iowa 2006) (collecting cases).

events may shape the need.”<sup>2</sup> An evidentiary hearing is not required where there is no material factual controversy at issue.<sup>3</sup>

### **III. Relief Requested**

The proposed Amended Preliminary Injunction submitted along with this Motion removes all reference to the accounts listed above. The Court’s entry of this proposed injunction would, therefore, have the effect of lifting the asset freeze as to these accounts. Should the Court choose to enter the proposed amended injunction, Mr. Cohn’s counsel will serve it on the relevant cryptocurrency exchanges and ensure that the freezes on these accounts are lifted.

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<sup>2</sup> *Sierra Club v. U.S. Army Corps of Engineers*, 732 F.2d 253, 256 (2d Cir. 1984).

<sup>3</sup> *Linc-Drop, Inc. v. City of Lincoln*, 996 F. Supp. 2d 845, 849 (D. Neb. 2014) (noting that “[a]n evidentiary hearing is only required before issuing an preliminary injunction if there is a material factual controversy,” and collecting cases).

Dated: October 8, 2024

Respectfully submitted,

THE HODA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "M. Hoda".

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